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Counsel to The Huntington National Bank

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:

**GANDY'S TRANSPORT, LLC,

Debtor.**

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Chapter 11

Case No. 24-43354-elm

**MOTION FOR LEAVE TO
APPEAR WITHOUT LOCAL COUNSEL**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The undersigned counsel for The Huntington National Bank ("Huntington"), for their motion to waive the local counsel requirement for Todd A. Atkinson of the law firm Womble Bond Dickinson (US) LLP ("WBD"), under Rule 2090-4 of Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the "Local Rules"), hereby states as follows:

1. On September 19, 2024, the Debtor filed a voluntary petition for relief under chapter 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the "Bankruptcy Code"). The Debtor is operating its business as debtor in possession under Bankruptcy Code sections 1107(a) and 1108.

2. Todd A. Atkinson of WBD Atkinson does not reside or maintain an office within 50 miles of the Northern District of Texas.

3. Mr. Atkinson does maintain an office in Houston, Texas and is a member of the bar of the State of Texas, in good standing, and admitted to practice in the U.S. District Court for the Northern and Southern Districts of Texas.

4. Mr. Atkinson has practiced bankruptcy law for over 15 years and is admitted to practice and in good standing in the U.S. Court of Appeals for the Fifth Circuit and Sixth Circuit, and the U.S. District Courts for the Northern District of Ohio, Southern District of Ohio, District of Delaware and Southern District of New York.

5. Counsel is prepared to perform all duties of local counsel, including appearance at hearings, as well as all other duties required by the Local Bankruptcy Rules or other procedures of the Court.

WHEREFORE, the undersigned counsel to Huntington requests the Court grant the motion for leave and exempt Huntington and its counsel at WBD from the requirement of obtaining local counsel under Local Bankruptcy Rule 2090-4.

Dated: January 13, 2025

WOMBLE BOND DICKINSON (US) LLP

/s/ Todd A. Atkinson

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Counsel to The Huntington National Bank

CERTIFICATE OF SERVICE

I certify that on January 13, 2025, a copy of the foregoing *Motion for Leave to Appear Without Local Counsel* was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF System.

/s/ Todd A. Atkinson

Todd A. Atkinson